

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

PREMIER ELECTRONICS, L.L.C,	)	
	)	
Plaintiff,	)	CASE NO. 3:18-cv-2036-S
v.	)	
	)	
ADT LLC,	)	
	)	
Defendant.	)	
	)	

**DEFENDANT ADT LLC’S MOTION FOR FINAL SUMMARY JUDGMENT**

Defendant ADT LLC, pursuant to Federal Rule of Civil Procedure 56 and the District Court of the Northern District of Texas Local Civil Rule 56, respectfully moves this Court for final summary judgment as to Count 1<sup>1</sup> (Tortious Interference with Existing Contracts with PCR Homeowners); Count 2 (Tortious Interference with Prospective Relations with PCR Homeowners); Count 3 (Tortious Interference with Existing Contract with the Developer and the Association); Count 4 (Tortious Interference with Existing Prospective Relations with Builders); Count 5 (Tortious Interference with Prospective Relations with respect to Walsh); Count 6 (Civil Conspiracy) of Plaintiff Premier Electronics, LLC’s First Amended Complaint [ECF No. 1-3]. In addition, ADT moves for final summary judgment as to Premier’s claim for exemplary damages arising from these claims. Fact and expert discovery in this matter have closed and there remain no issues of material fact as to these claims. ADT is therefore entitled to final summary judgment

---

<sup>1</sup> The counts within Plaintiff’s First Amended Complaint are not individually numbered. Accordingly, ADT has assigned each count a number based on its appearance in the First Amended Complaint. ADT’s does not assign Premier’s claim for exemplary damages a separate count number.

as a matter of law.

In compliance with LR 56.3, the elements of each claim or defense as to ADT seeks summary judgment are contained within ADT's Brief in Support of ADT's Motion for Final Summary Judgment, filed contemporaneously with the instant motion. In addition, pursuant to LR 56.6, ADT also files an Appendix containing those record materials relied upon in support of its Motion for Final Summary Judgment.

ADT respectfully requests this Court grant its Motion for Final Summary Judgment and enter judgment in its favor and against Plaintiff Premier Electronics, LLC.

Dated January 10, 2019

Respectfully submitted,

By: /s/ Eric S. Boos  
Eric S. Boos (*Pro Hac Vice*)  
SHOOK, HARDY & BACON LLP  
Citigroup Center  
201 S. Biscayne Blvd., Suite 3200  
Miami, FL 33131-4332  
Telephone: 305-358-5171  
Facsimile: 305-358-7470  
[esboos@gmail.com](mailto:esboos@gmail.com)

Tanya L. Chaney  
Texas Bar No. 240363375  
SHOOK, HARDY & BACON LLP  
JPMorgan Chase Tower  
600 Travis Street  
Suite 3400  
Houston, TX 77002-2926  
Telephone: 713-227-8008  
Facsimile: 713-227-9508  
[tchaney@shb.com](mailto:tchaney@shb.com)

***Attorneys for Defendant ADT LLC***